

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**FIDELITY AND DEPOSIT COMPANY OF
MARYLAND,**

Plaintiff

v.

**LAS PIEDRAS CONSTRUCTION CORP., et
al.,**

Defendants.

CIVIL ACTION NO. 16-01800 (RAM)

Breach of Contract, Specific Performance,
Civil Code Indemnity, Common Law
Indemnity, Exoneration, Quia Timet

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE

COME NOW, Plaintiff, Fidelity and Deposit Company of Maryland (“Surety”), and Defendants, Las Piedras Construction Corp. (“Las Piedras”), L.P.C.&D., Inc. (“LPCD”), Tejo, Inc., (“Tejo”), Equipment Depot, Inc. (“EDI”), Kane Caribbean, Inc. (“KCI”), Piezas Extra, Inc. (“PEI”), Equipos de Boqueron, Inc. (“EBI”), Caribbean Raceway Park, Inc. (“CRP”), Hacienda Cuco, Inc. (“HCI”), and Pedro Feliciano Benitez (“Feliciano”) (collectively “Defendants”), by and through their undersigned attorneys, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate as follows:

1. All claims by, against, or between the parties in this action are dismissed ***with prejudice*** with each party to bear and be responsible for their own attorneys’ fees and costs.

Dated: August 27, 2021.

Respectfully submitted,

GURLEY & ASSOCIATES

PO Box 8387
Fernández Juncos Station
San Juan, Puerto Rico 00910-8387
Telephone: (787) 522-0525
Facsimile: (787) 522-0524

/s/ Alfredo Fernandez Martinez

Alfredo Fernandez Martinez
USDC-PR #210511
afernandez@gurleyassociates.com

/s/ David E. Gurley

David E. Gurley
USDC-PR # 221202
dgurley@gurleyassociates.com

*Counsel for Fidelity and Deposit
Company of Maryland*

**ANTONETTI MONTALVO
& RAMIREZ COLL**

P.O. Box 13128
San Juan, PR 00908
Tel: (787) 977-0303
Fax: (787) 977-0323

s/ José L. Ramírez-Coll

JOSÉ L. RAMÍREZ-COLL
USDC-PR No. 221702
Email: jramirez@amrclaw.com

/s/ Omar Hopgood

OMAR HOPGOOD
USDC-PR No. 229306
ohopgood@amrclaw.com

Counsel for all Defendants

CERTIFICATE OF SERVICE

I certify that on this same date a copy of the forgoing was electronically filed with the Clerk of the Court using the CM/ECF system which will automatically send notice of such filing to all attorneys of record.

In San Juan, Puerto Rico, this 27th day of August, 2021.

GURLEY & ASSOCIATES

PO Box 8387
Fernández Juncos Station
San Juan, Puerto Rico 00910-8387
Telephone: (787) 522-0525
Facsimile: (787) 522-0524

/s/ Alfredo Fernandez Martinez

Alfredo Fernandez Martinez
USDC-PR #210511
afernandez@gurleyassociates.com

/s/ David E. Gurley

David E. Gurley
USDC-PR # 221202
dgurley@gurleyassociates.com

*Counsel for Fidelity and Deposit
Company of Maryland*